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6 *Attorney for Plaintiff*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 EDWARD HURT  
10 Plaintiff,

11 v.

12 DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR IXIS  
13 REAL ESTATE CAPITAL TRUST 2005-  
HE3 MORTGAGE PASS THROUGH  
14 CERTIFICATES, SERIES 2005-HE3  
Defendants  
15  
16

Case No. 2:17-cv-1122-JAD-CWH

**STIPULATION AND ORDER FOR  
EXTENSION TO RESPOND TO  
MOTION TO DISMISS [ECF 19]**

**(FIRST REQUEST)**

ECF No. 24

17 Defendant Deutsche Bank National Trust Company, as Trustee for IXIS Real  
18 Estate Capital Trust 2005-HE3 Mortgage Pass Through Certificates, Series 2005-HE3  
19 (hereinafter “Deutsche Bank”), by and through its attorneys of record, Dana Jonathon  
20 Nitz, Esq. and Lindsay D. Robbins, Esq. of the law firm of Wright, Finlay & Zak, LLP,  
21 and Plaintiff, Edward Hurt (“Hurt”), by and through his attorney of record, Allison R.  
22 Schmidt, Esq. of the law firm of Allison R. Schmidt, Esq. LLC, and hereby STIPULATE  
23 AND AGREE to extend the deadline for Hurt to file his response to Deutsche Bank’s  
24 Motion to Dismiss, currently due September 22, 2017, by 17 days, to **October 9, 2017**.

25 The extension is requested as Hurt is gathering facts necessary to respond to the  
26 Motion. Additionally, the parties are engaged in ongoing settlement discussions.  
27

1 This is the parties first request for an extension of this deadline, made in good  
2 faith, and not for the purposes of prejudice or delay.

3  
4 DATED this 22nd day of Sept, 2017.  
WRIGHT, FINLAY & ZAK, LLP

5 /s/ Lindsay D. Robbins, Esq.

6 Dana Jonathon Nitz, Esq.  
Nevada Bar No. 0050  
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11 *Attorneys for Defendant, Deutsche Bank*  
12 *National Trust Company, as Trustee for*  
13 *IXIS Real Estate Capital Trust 2005-HE3*  
*Mortgage Pass Through Certificates,*  
*Series 2005-HE3*

DATED this 22nd day of Sept, 2017.  
ALLISON R. SCHMIDT ESQ. LLC

/s/ Allison R. Schmidt, Esq.

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*Attorney for plaintiff*

14  
15 **ORDER**

16 IT IS SO ORDERED.

17 DATED 9/22/17

18  
19   
20 \_\_\_\_\_  
DISTRICT COURT JUDGE